

**UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>DAVID and MARGARET DOWNS</b>	:	
	:	
<b>Plaintiff</b>	:	
	:	
<b>v.</b>	:	<b>CIVIL ACTION</b>
	:	
<b>BOROUGH OF JENKINTOWN, ET AL.</b>	:	<b>NO. 18-CV-4529</b>
	:	
<b>Defendants</b>	:	
	:	

**PLAINTIFF’S MOTION FOR RECONSIDERTION AND/OR TO ALTER/AMEND  
THE COURT’S MAY 22, 2020 ORDER AND DECISION PARTIALLY  
GRANTING DEFENDANTS’ MOTION FOR SUMMARY JUDGMENT**

On May 22, 2020, the Clerk entered the Court’s Order and Opinion partially granting Defendants’ Motion For Summary Judgment. (A copy of the Opinion is appended hereto as Exhibit “A”.) Plaintiff believes the Court made errors in deciding facts and applying the law to Plaintiff’s claims for First Amendment Retaliation against Defendants, Borough of Jenkintown, Deborah Pancoe and Richard Bunker. Plaintiff moves that the Court alter its judgment as to Plaintiff’s First Amendment Retaliation claims against the aforesaid Defendants and vacate its decision to grant summary judgment.

/s/ William J. Fox  
WILLIAM J. FOX, ESQUIRE  
Attorney for Plaintiff  
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Date: June 18, 2020